

December 7, 2015

Mr. David Anderson
Director, Properties
American Airlines
By email to david.anderson2@aa.com

Dear Mr. Anderson:

Thank you for participating in the airline meeting on October 29, 2015 where we discussed the current noise impact from airline operations at Phoenix Sky Harbor International Airport (Sky Harbor) as a result of the September 2014 flight procedure changes implemented by the Federal Aviation Administration (FAA).

The purpose of my letter today is to express disappointment that, according to your letter of November 25, 2015, the airlines have rejected our request, to voluntarily fly the legacy west flow Standard Instrument Departure routes (SIDs) at Sky Harbor during the nationally recognized nighttime hours of 10:00 pm - 7:00 am.

In addition, we are disappointed and surprised that, after more than a year of discussions about this issue, the airlines' response fails to acknowledge the real impacts being felt by the Phoenix community, misstates significant core facts and fails to offer any constructive or concrete recommendations to reduce noise impacts.

The Federal Aviation Administration (FAA) recommended¹ last spring that the City of Phoenix approach the airlines to explore voluntary noise mitigation measures, including the use of the legacy West Flow SIDs during the nighttime hours. This suggestion was reiterated in two subsequent letters from the FAA on June 1 and June 24, 2015. Therefore, the airlines' response is curious, at best.

These legacy SIDs remain currently-published and valid, are used every day by the airlines serving Sky Harbor, and can be used to reduce noise impacts. Accordingly, Sky Harbor asked that the airlines join us in the effort to use the legacy departure procedures during the nighttime hours or to identify an alternate procedure that accomplishes the goal of significant noise relief to the community.

As the airlines well know, the voluntary use of alternative flight tracks during the nationally recognized nighttime hours is a common industry practice. Utilizing existing and published SIDs does not require additional FAA approval. This method is used at many other U.S. airports-- airports that have noise issues at lower noise levels than

¹ See e.g., Letter from Glen Martin, FAA, to Ed Zuercher, Phoenix on April 14, 2015, page 3.

exist near the new routes in Phoenix. We do not understand the airlines' lack of willingness to voluntarily choose less disruptive flight paths at night as a show of good faith to the Phoenix community. We see no reason why this cannot be done while we work together on a permanent solution to the noise problem being generated from the new flight procedures.

Below we address many of the major points from your letter that require a response by Sky Harbor. We ask that each of these points be given real and meaningful consideration.

1. The airline letter states that the new noise is only "perceived" by the communities now being overflowed by the new RNAV routes and that "...implementation of the procedures reduced overall noise exposure to the community..." Through modeling, monitoring and observation, the unfortunate significance of the noise increase has been well documented and the airlines' statement is contrary to all available evidence.

Modeling performed by the FAA² to support their Categorical Exclusion document showed large, reportable noise level increases as a result of the new RNAV routes. Earlier this year the City performed noise modeling and monitoring of the implemented RNAV routes³ and found that the population exposed to aircraft noise had nearly doubled.

Finally, we also know that the community is heavily impacted by these routes because of the sheer volume of noise complaints, which have increased by 2,700% (almost zero to now thousands per month⁴). We respectfully ask that the airlines do not discount the perceived, professed, experienced, felt, noticed, suffered and reported increase in community noise exposure.

2. We do not understand the airlines' concerns about using the legacy procedures during the nationally recognized nighttime hours of 10pm - 7am. Your letter stated that flying the legacy SIDs would require a revision to current procedures, "which itself would require a consideration of the impacts and FAA approval." This is incorrect.

The legacy SIDs are still valid and published procedures (indeed, Maxxo Three, Stanfield Four, St. Johns Eight, Silow Four, Mobie Four, Masxxo Three, Buckeye Four and Chily Four are all in the current FAA Terminal Procedures Publication). The original SIDs remain available for use by any pilot or airline during the night or day. Airline

² Per FAA Categorical Exclusion for PHX RNAV SIDs and STARs, September 12, 2013, and FAA Categorical Exclusion revalidation, March 11, 2014

³ Per Landrum & Brown noise study, presented to City of Phoenix Mayor & Council April 16, 2015

⁴ Per City of Phoenix published, monthly and annual noise reports

dispatch departments and pilots could direct their use at night with no additional FAA approval and no need for FAA environmental analysis. This is how voluntary noise abatement procedures work all around the country for American Airlines and other airlines. If there is some reason why the airlines are unable to request and/or fly these original SIDs (other than the incorrect reason stated in your letter), please provide us with a detailed explanation.

Phoenix's noise-centered concerns are not unique. This is an issue at airports across the country and the outcry from communities about the new noise they are experiencing has been overwhelming. We see that the FAA is working with other airports to identify solutions and we understand that airlines have developed their own procedures at other airports to address such noise-related concerns. The message that the Phoenix community – and other communities addressing NextGen procedures – are taking from the letter is that the airlines do not believe that they have a responsibility to work with Sky Harbor management to address a serious community problem.

3. The City agrees that safety is the most important issue associated with flight tracks. However, the original departure procedures and SIDs have been in place for many years, are still in place, and are still being flown today (especially by the roughly 20 percent of the airline fleet using Sky Harbor that are not equipped to fly RNAV procedures). We are not aware of any safety issues that were expressed in the many years the original SIDs were the only departure procedures in place nor are we aware of any safety issues that have been expressed recently. We are quite sure that, if there were any actual safety issues, these would have been brought to our attention and that the FAA would have already addressed them via amendment to the relevant SIDs.

4. When we met on October 29, the airlines suggested that a nighttime legacy procedure would be a major inconvenience and increase emissions. To better understand this comment, we researched the last 12 months of operations data at Sky Harbor. As hub carriers, American and Southwest are the busiest two operators at Sky Harbor with approximately 125,000 combined departures. Of these departures, approximately 5,500 (less than 5% of total annual operations) occurred between 10pm - 7am during west flow. For the rest of the airlines at Sky Harbor, that number is even less. Given that all airlines at Sky Harbor would retain at least 95% of their existing and purported emission benefits if you were to fly the legacy SIDs at night, we are disappointed to learn that you will not make this voluntary good faith effort for the Phoenix community.

5. The letter says that the FAA implemented the new procedures in September 2014 “in consultation with PHX officials” and included “engagement with the airport going back to 2012” this grossly overstates the FAA’s involvement with the local community. What is true is that the FAA provided zero opportunity for public input, citing a categorical exclusion, while conspicuously avoiding contact with Sky Harbor management.

6. Finally, the airlines note that the new RNAV procedures help minimize delays in Phoenix. Everyone in this industry supports measures that reduce delays. However, there must be a careful balance of benefits to air carriers against burdens to the communities they serve. According to the most recent USDOT Air Travel Consumer Report⁵, of the Nation's 10 busiest airports, Sky Harbor has the lowest departure delay factor. Moreover, the delay implications of our proposed voluntary measures are insignificant. The delays that do occur at Sky Harbor generally occur during peak daytime hours, not the less-active nationally recognized nighttime hours that would be the subject of a voluntary use of the original SIDs. All we are asking is that the carriers consider that balance and share an insignificant portion of the burden.

In summary, 1) the noise created by the new RNAV route is proven by data to be very real and disturbing to a large part of our community; 2) there is no need for additional FAA approvals or environmental studies to implement voluntary nighttime hours use of the published available legacy SIDs; 3) the legacy flight paths have always been and still are safe; 4) any emissions savings from the voluntarily compliance with this request are negligible, especially as compared to the noise impacts; 5) there was no public process prior to implementation of the new flight paths; and 6) Sky Harbor enjoys some of the lowest airline delays in the country.

Our ability to advance aviation in Phoenix over the long term depends on a cooperative approach in which both Sky Harbor and airlines are partnering to be good neighbors. The airlines' rejection of residents' concerns suggest that they do not share in our belief that being a good neighbor is fundamental to all of our success in the future.

Given the above, we are hopeful that this letter will allow the airlines to put aside their concerns about utilizing the legacy departure procedures during the nationally recognized nighttime hours and make a good faith effort for the benefit of our community.

On behalf of the Phoenix community I urge you to reconsider our request and either voluntarily use the legacy departure routes during the nighttime hours or identify other measures that would provide meaningful short-term noise relief while the flight tracks are being evaluated by FAA.

Sincerely,

James E. Bennett, A.A.E.
Director of Aviation Services

Cc: Stephen Johnson, VP Corp. Affairs, AA
Craig Drew, Sr. VP Air Operations, SWA
Phoenix Airline Airport Affairs Committee (AAAC)
Airlines for America (A4A)
Ed Zuercher, Phoenix City Manager

⁵ <https://www.transportation.gov/sites/dot.gov/files/docs/2015NovemberATCR.pdf>